

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISON**

PATRICK PURSLEY,	)	
	)	
Plaintiff,	)	
v.	)	Case No. 1:15-cv-04313
	)	
TARRY WILLIAMS, et al.,	)	Honorable Virginia M. Kendall
	)	
Defendants.	)	
	)	
	)	

**JOINT STATUS REPORT**

Plaintiff, Patrick Pursley, by his attorneys, Loevy & Loevy, and Defendants Williams, Pfister, Lough, Daly, and Luchsinger, by their attorneys, the Office of the Illinois Attorney General, pursuant to this Court's January 11, 2018 Order, hereby state the following regarding the status of the case:

1. Counsel for Plaintiff and Defendants Williams, Pfister, Lough, Daly, and Luchsinger (the IDOC Defendants) have conferred regarding the scheduling of depositions in this case per the Court's instruction during the status hearing on January 11, 2018. Dkt. 148. Counsel for Defendants Wexford and Obaisi refused to participate in the preparation of this report, stating that "a meeting to set a discovery schedule is premature" until Plaintiff's Second Amended Complaint is filed. Ex. A.

2. Counsel for Plaintiff and Counsel for the IDOC Defendants conferred via phone and agreed to the following schedule for depositions:

<b>Deponent</b>	<b>Date</b>	<b>Time</b>	<b>Location</b>
Defendant Wexford's 30(b)(6) Representative	February 26, 2018	10:00 am	Loevy & Loevy, 311 N. Aberdeen Street, 3rd Floor, Chicago, IL 60615
Defendant Saleh Obaisi's Representative	February 27, 2018	10:00 am	Loevy & Loevy, 311 N. Aberdeen Street, 3rd Floor, Chicago, IL 60615
Defendant Tarry Williams	March 5, 2018	10:30 am	Thompson Center, 100 W Randolph Street, Chicago, IL 60601
Defendant Randy Pfister	March 6, 2018	10:00 am	Stateville Correctional Center, 16830 Route 53, Crest Hill, IL 60403
Defendant James Louch	March 7, 2018	9:00 am	George E. Rydman & Associates, Ltd., 15 W Jefferson Street, Joliet, IL 60432
Defendant Jermiagh Daly	March 7, 2018	1:00 pm	George E. Rydman & Associates, Ltd., 15 W Jefferson Street, Joliet, IL 60432
Eselina Givens	March 8, 2018	10:00 am	Stateville Correctional Center, 16830 Route 53, Crest Hill, IL 60403
Captain Morgan	March 8, 2018	12:00 pm	Stateville Correctional Center, 16830 Route 53, Crest Hill, IL 60403
Sergeant Seevers	March 8, 2018	2:00 pm	Stateville Correctional Center, 16830 Route 53, Crest Hill, IL 60403
IDOC 30(b)(6) Representative	March 9, 2018	10:00 am	George E. Rydman & Associates, Ltd., 15 W Jefferson Street, Joliet, IL 60432
Plaintiff Patrick Pursley	March 12, 2018	10:00 am	Loevy & Loevy, 311 N. Aberdeen Street, 3rd Floor, Chicago, IL 60615

3. Counsel for the IDOC Defendants and Counsel for Plaintiff did not schedule a deposition for Defendant Luchsinger, as we are awaiting his affidavit regarding his retirement from the IDOC.

4. Furthermore, given the fact that some Parties have failed to properly identify potential witnesses pursuant to Rule 26(a)(1), Plaintiff reserves our right to call witnesses that are revealed as discovery progresses or are indicated by Defendants to be called as witnesses.

Respectfully submitted,

/s/ Aisha N. Davis  
Attorney for Plaintiff

Jon Loevy  
Sarah Grady  
Aisha N. Davis  
Loevy & Loevy  
311 N. Aberdeen, 3rd Floor  
Chicago, IL 60607  
312-243-5900  
[aisha@loevy.com](mailto:aisha@loevy.com)

/s/ Erik Johnson  
Attorney for Defendants Williams,  
Pfister, Louch, Daly, and Luchsinger

Erik Johnson  
Office of the Illinois Attorney General  
100 West Randolph Street, 13th Floor  
Chicago, IL 60601  
[erjohnson@atg.state.il.us](mailto:erjohnson@atg.state.il.us)

**CERTIFICATE OF SERVICE**

I, Aisha N. Davis, an attorney, certify that on February 1, 2018 I caused the foregoing **Joint Status Report** to be filed via the Court's CM/ECF electronic filing system, which effected service on all counsel of record.

/s/ Aisha N. Davis